

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

v.

RICHARD SCHUELER aka RICHARD
HEART, HEX, PULSECHAIN, and
PULSEX

Defendants.

Case No. 1:23-CV-5749
NOTICE OF MOTION TO
ADMIT COUNSEL *PRO*
HAC VICE

To: Opposing Counsel

Matthew J. Gulde

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate(s) of Good Standing annexed thereto, I, Michael W. Ingram will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of movant, a member of the firm of Kirk & Ingram, LLP and a member in good standing of the bar of the State of California, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for Richard Schueler aka Richard Heart. There are no pending disciplinary proceedings against me in any state or federal court.

Dated: January 16, 2024

Respectfully submitted,

KIRK & INGRAM, LLP

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*Counsel for Richard Schueler aka Richard
Heart*